

ETHYL CORPORATION

LAW DEPARTMENT

ETHYL TOWER
481 FLORIDA
BATON ROUGE, LA. 70801

May 21, 1984

Director, Waste Management Division
U. S. EPA, Region V
230 S. Dearborn Street
Chicago, IL 60604

Attention: Dan Hopkins
Remedial Response Branch (5HR-13)

Re: 40 CRF Part 775, Subpart J
Disposal of Waste Material containing
TCDD; Edwin Cooper, Inc., Sauget, Illinois

Dear Sir:

Without conceding the applicability of the above referenced rule or the validity of the administrative order issued to Edwin Cooper, Inc., this is to formally notify you that traces of 2,3,7,8-TCDD have been found in portions of Edwin Cooper, Inc.'s oil lubricant production plant on Monsanto Avenue in Sauget, Illinois. This notice covers the requirements of §775.190(b), as suggested by Roger Field and Tom Daggett of EPA's office of regional counsel. Notification is given to you, pursuant to the administrative order, rather than to the Assistant Administrator. The site had previously been owned by Monsanto, which had used it for production of 2,4-D and the mixing of 2,4-D with 2,4,5-T. Edwin Cooper, Inc. has previously notified EPA Region V of this discovery and has met with representatives of the regional office.

Edwin Cooper, Inc.'s corporate headquarters is 1525 South Broadway, St. Louis, Missouri 63104. Edwin Cooper, Inc. is a wholly-owned subsidiary of Ethyl Corporation.

Two sets of samples were taken in November and December of 1983. The analysis has previously been submitted. The report of the analysis includes the method of detection, etc. specified in §775.190(b)(3). When the analysis indicated the presence of 2,3,7,8-TCDD, a construction project in the area was suspended and the area roped off. As you know, Edwin Cooper, Inc. has agreed with the Region V office to take and analyze further soil samples to better characterize the nature and extent of the contamination.

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Since this site is in the middle of our manufacturing facility, which for the most part is paved or covered with crushed rock, we believe that the most prudent course of action to minimize existing environmental exposure is to complete the construction project, in accordance with the description of work and health and safety plan previously submitted. No soil would be moved off-site, and all soil suspected of being contaminated with 2,3,7,8-TCDD would be covered with asphalt or rock in a manner that would prevent dusting of soil, but would allow reasonable access to the soil in the event the soil needed to be removed. It is estimated that there are 110 cubic yards of soil that is piled and will be placed in a concrete vault area that is capable of containing 130 cubic yards, and will be sealed with asphalt.

The health and safety plan provides for a decontamination procedure for personnel and equipment involved with soil. The waste produced in this activity is the only material that would be disposed off-site, presumably at a TSDF approved for disposal of waste contaminated with 2,3,7,8-TCDD.

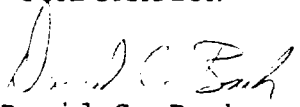
However, no waste material from the decontamination process will move off-site until 60 days after this notice is received or until you exercise your discretion under §775.197(c) and waive the 60 day notice requirement.

We would appreciate your or Region V's assistance in locating a disposal facility for the waste produced in the decontamination process. Of course, if we find a facility specifically permitted for TCDD disposal this notice will not be necessary, according to 40 CFR §775.197(a).

You may direct questions for clarification or for additional information to me (504 - 388-7053), to Don E. Park, Director of Environmental Affairs for Ethyl Corporation (504 - 359-2247) or to Sam McWilliams, Edwin Cooper Plant Manager at Sauget (618 - 274-4000).

Respectfully yours,

ETHYL CORPORATION


By: David C. Bach
Assistant Counsel

DCB:ms

cc: S. McWilliams
D. E. Park

5/21/84

PROPOSED SOIL SAMPLING PROGRAM

EDWIN COOPER, INC.

SAUGET PLANT

SUPPLEMENT

The proposed Soil Sampling Program, dated 2/29/84, was developed and based on the recommendations of Mr. Norm Niedergang of the Federal EPA and Mr. Ken Mensing of the Illinois EPA to better define the extent of the 2,3,7,8 TCDD contamination at the plant. The following information supplies more detail concerning the proposed sampling points.

Samples 1 and 2

These sample points are located on the east fence line south of sample #4 taken 11/7/83 to determine whether 2,3,7,8 TCDD contamination is absent on the southern portion of the plant's east boundary.

Samples 3, 4, 5 and 6

These sample points were chosen to determine whether the 2,3,7,8 TCDD contamination found in the area of the black tanks extends into the immediately adjacent areas in a north, south, east and west direction.

Sample Point No. 7

Sample point No. 7 was chosen as this area is near directly between the black tank area and the Unit 268 area to determine whether 2,3,7,8 TCDD contamination is present.

Sample Point No. 8

Sample point No. 8 was chosen to determine whether the 2,3,7,8 TCDD contamination found in the area of track 21 extends southerly along the track.

Sample Point No. 9

Sample point No. 9 was chosen to determine whether the 2,3,7,8 TCDD contamination found directly west of track 21 extends further to the west.

ELH/DD

Samples 10, 11, and 12

These sampling points were chosen to determine whether the 2,3,7,8 TCDD contamination found in the immediate area of Unit 268 extend outside of the unit area in a northerly direction.

Sample Points 13 and 14

These sample points were selected to determine whether any 2,3,7,8 TCDD contamination is present immediately adjacent to tracks 21 and 23 in the northern portion of the plant.

Sample Point 15

This sampling point was selected to determine whether 2,3,7,8 TCDD contamination exists in the northwestern corner of the plant as some small amount of soil removed from the Unit 268 construction area was deposited in this portion of the plant.

Sampling Point 16

This sample location was selected as a previous sample at that same location revealed 2,3,7,8 TCDD contamination at a level of 110 PPB.

Sample Point 17

This sampling point was selected as it also represents a previous sample site which analysis showed to contain 100 PPB 2,3,7,8 TCDD.

Sampling Points 18 and 19

These sampling points are located in sewer manholes directly east of Unit 268 to determine whether 2,3,7,8 TCDD was present in the sewers. Sample point No. 19 was subsequently found to be too deep for the sampling equipment.

The individual samples taken to make up the composite samples at each of the sampling points will normally be spaced two to three feet apart. The one exception is the sample taken at location No. 15. This sample will be a composite of five samples taken approximately 20 to 30 feet apart.

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ADDENDUM - DESCRIPTION OF REMAINING CONSTRUCTION WORK
IN THE UNIT 268 CONSTRUCTION SITE - EDWIN COOPER, INC.
SAUGET PLANT

1. The sealed area for containment of the excavated materials will have the following approximate dimensions:

depth	3 feet
width	32 feet
length	46 feet

Correcting for the volume of the tank footings, the volume of this sealed area will be approximately 130 cubic yards.

Estimates of the volume of the piles of contaminated dirt along track 21 and along the old dike area is approximately 110 cubic yards.

2. The sealed area contains an existing concrete floor of re-inforced concrete 12 inches in thickness. The side walls will also be reinforced concrete 8 inches in thickness. The asphalt seal on top of the compacted fill inside the sealed area will be at least 3 inches thick and sloped such that drainage will be away from the sealed area.
3. The exiting concrete floor will be checked for leaks and cracks and if any exist they will be repaired before dirt is added to the sealed area. As noted in the construction plan dated May 21, 1984, this sealed area will contain all contaminated dirt piled along track 21 and along the old dike area (piles located to the north and east of the old dike are).
4. A dust control plan has been included in the Health and Safety Plan dated May 21, 1984. Refer to page 1, section II, for details.